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Attorneys for Defendants
SAN FRANCISCO COMMUNITY INVESTMENT FUND,
CITY AND COUNTY OF SAN FRANCISCO, and NAOMI KELLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, *ex rel.*
LEIASA BECKHAM, and STATE OF
CALIFORNIA, *ex rel.* LEIASA BECKHAM,

Plaintiffs,

vs.

1850 BRYANT LAND LLC, KASLOFSKY
& ASSOCIATES LLC, THURSTON
KASLOFSKY, CHRISTOPHER PAUL
FOLEY, DOUGLAS ROSS, SAN
FRANCISCO COMMUNITY
INVESTMENT FUND, CITY AND
COUNTY OF SAN FRANCISCO, and
NAOMI KELLY,

Defendants.

Case No. 3:21-cv-05742-RS

**STIPULATION AND [PROPOSED] ORDER
TO MODIFY CASE SCHEDULE**

Trial Date: July 27, 2026

1 Pursuant to N.D. Cal. Civ. L.R. 6-2 and 7-12, Plaintiff-Relator Leiasa Beckham (“Plaintiff”)
2 and Defendants 1850 Bryant Land LLC, Christopher Paul Foley, Douglas Ross, Kaslofsky &
3 Associates LLC, Thurston Kaslofsky, San Francisco Community Investment Fund, City and County of
4 San Francisco, and Naomi Kelly (collectively “Defendants”), by and through their undersigned
5 counsel, hereby advise the Court and stipulate as follows:

6 WHEREAS, on November 16, 2023 the Court issued the Initial Case Management Scheduling
7 Order setting deadlines in this matter (Dkt. 98); and

8 WHEREAS, the Parties engaged in settlement discussions in the summer of 2024 but were
9 unable to reach a resolution; and

10 WHEREAS, Plaintiff’s then counsel filed a motion to withdraw as counsel on October 4, 2024
11 (Dkt. 113), and the Court granted Plaintiff’s current counsel’s motion to substitute in as counsel on
12 December 3 (Dkt. 120); and

13 WHEREAS, on January 27, 2025, the Court issued a Case Management Scheduling Order
14 setting forth various case deadlines (Dkt. 125); and

15 WHEREAS, on June 12, 2025, Plaintiff Beckham’s counsel served Rule 30(b)(6) deposition
16 notices and Rule 34 requests for production on several Defendants in this case, and, despite their
17 diligent efforts, Defendants were unable to fully respond to those requests by the then July 18, 2025
18 fact discovery cut-off; and

19 WHEREAS, Plaintiff’s counsel had trials scheduled in other matters in late September 2025,
20 making the then-operative expert discovery and summary judgment schedule infeasible; and

21 WHEREAS, on July 11, 2025, the Court entered a stipulated revised case schedule with an
22 expert discovery deadline of December 19, 2025, and summary judgment deadline of February 6, 2026
23 (Dkt. 139); and

24 WHEREAS, Plaintiff and Defendant Kaslofsky & Associates have a dispute about a deposition
25 of Mr. Kaslofsky; and

26 WHEREAS, this fall Plaintiff’s lead counsel suffered a serious health event, necessitating time
27 for recovery; and

28 WHEREAS, Defendants have granted Plaintiff until December 31, 2025, to supplement (or

stand on) Plaintiff's response to an interrogatory seeking identification of claims for payment related to 1850 Bryant; and

WHEREAS, Plaintiff's privilege log is outstanding; and

WHEREAS, the Parties agree that identification of actionable claims for payment of federal or state funds or identification of obligations to pay the federal or state governments in connection with the proposed property development at 1850 Bryant Street is a threshold issue that does not depend on expert discovery or any challenges to claims of privilege, though Plaintiff believes there are other avenues for liability and damages;

THEREFORE, to conserve the Parties' and Court's resources, particularly during Plaintiff's lead counsel's medical recovery:

1. The Parties agree to a briefing schedule for an early joint summary judgment motion by Defendants, of limited pages, addressing only whether there are actionable claims for payment from or obligations to pay the federal or state governments related to the 1850 Bryant project. This briefing schedule is laid out in the table below.

2. The Parties agree that, by agreeing to an early summary judgment motion on this threshold issue, Defendants do not waive the right to contest the remaining elements of Plaintiffs' causes of action (*e.g.*, scienter, materiality, etc.) in a subsequent dispositive motion (if necessary).

3. The Parties agree that expert discovery, namely, depositions of the Parties' disclosed expert witnesses, is stayed, and any other post-expert discovery case deadlines in the previous case schedule (Dkt. 139) are suspended.

4. The Parties agree that, should the Court deny Defendants' motion for summary judgment as to actionable claims for payment from or obligations to pay the federal or state governments related to the 1850 Bryant project, the Parties shall, within 14 days, submit a proposed schedule for expert discovery, dispositive motions on the remaining elements of Plaintiffs' causes of action, and trial.

Event	Proposed Date	Page Limit
Defendants' Joint Motion for Summary Judgment regarding only whether there are actionable claims for payment from or obligations to pay the federal or state governments	March 20, 2026	18

Plaintiff's Opposition	April 10, 2026	18
Defendants' Joint Reply	May 1, 2026	10
Hearing on Defendants' Joint Motion	May 21, 2026 (or such time that is convenient for the Court)	n/a

SO STIPULATED.

Dated: December 19, 2025

DAVID CHIU, City Attorney

By: /s/ Miguel A. Gradilla

MIGUEL A. GRADILLA

KARUN TILAK

MOLLY J. ALARCON

MICHAEL I. LEVIN-GESUNDHEIT

Attorneys for Defendants

SAN FRANCISCO COMMUNITY

INVESTMENT FUND, CITY AND COUNTY

OF SAN FRANCISCO, and NAOMI KELLY

Dated: December 19, 2025

SEVERSON & WERSON

By: /s/ Andrew S. Elliott

ANDREW S. ELLIOTT

ELIZABETH C. FARRELL

Attorneys for Defendants 1850 BRYANT LAND LLC,
CHRISTOPHER PAUL FOLEY AND DOUGLAS
ROSS

Dated: December 19, 2025

JACKSON LAW GROUP, P.C.

By: /s/ Aaron R. Jackson

AARON R. JACKSON

Attorneys for Defendants KASLOFSKY &
ASSOCIATES LLC and THURSTON KASLOFSKY

Dated: December 19, 2025

FRUCHT & GEONETTA LLP

By: /s/ Kenneth Frucht

KENNETH FRUCHT

FREDERICK J. GEONETTA

Attorneys for Plaintiff LEIASA BECKHAM

IT IS SO ORDERED.

DATED: _____

HON. RICHARD SEEBORG

U.S. District Court Judge

CIVIL L.R. 5-1(h)(3) ATTESTATION

I, Michael I. Levin-Gesundheit, attest that each of the other signatories have concurred in the filing of this document, which shall serve in lieu of their own signatures on the document.

Dated: December 19, 2025

DAVID CHIU
City Attorney

By: /s/ Michael Levin-Gesundheit

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